

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

CORBET JONES,

Plaintiff,

VERSUS

JONES COUNTY, MS, ET AL.  
Defendants.

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CIVIL ACTION NUMBER:

2:22-CV-93-KS-MTP

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**SUPPLEMENT TO RESPONSE IN**  
**OPPOSITION TO MOTION TO DISMISS FOR LACK OF STANDING FILED BY**  
**JONES COUNTY, SHERIFF JOE BERLIN, AND JENNIFER HENDERSON**

In the Plaintiff's Memorandum [ECF No. 73] in Support of its Response in Opposition to the Motion to Dismiss for Lack of Standing Filed by Defendants' Jones County, Sheriff Berlin, and Jennifer Henderson, we stated the following:

Furthermore, although the Defendants' Motion lacks merit, the Plaintiff is in the process of opening an estate for Andrew Jones and intends to seek leave to add the estate as a party. This is a prudential action, as it is unnecessary for jurisdiction under the law or facts. However, to the extent there can be any doubt about standing in this case because of the absence of an estate, this action will cure it. Given that the three-year statute of limitations has not run on any § 1983 claims arising out of Andrew Jones's incarceration and his death on January 9, 2021, adding the estate will be timely and justified.

ECF No. 73 at 3.

This Supplement to the Response is submitted to apprise the Court that, although it has taken longer than previously thought, the petition to open the estate was filed by the Plaintiff this past Thursday. (See Exhibit 1). Today, a proposed order is being submitted to the Chancery Court Judge in Jones County to open the estate and name the Plaintiff as the Administrator of it. Once that order is signed, the Plaintiff will file a motion in this case to add the estate as a

plaintiff. To reiterate, the estate need not be added at this juncture but the Plaintiff will move to do so out of an abundance of caution. In the meantime, this supplement is filed in order to inform the Court that the process to establish the estate is moving forward.

Respectfully submitted,

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Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing motion has been served upon all counsel of record via the Court's ECF/CMF system, which will send notice of filing to all counsel of record, on this 24<sup>th</sup> day of July, 2023.

/s/ Robert McDuff  
Co-Counsel for Plaintiff